



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

*610 Federal Plaza  
Central Islip, New York 11722*

October 11, 2022

By ECF

Honorable Alan Trust  
United States Bankruptcy Court  
Eastern District of New York  
Alfonse M. D'Amato Federal Courthouse  
290 Federal Plaza, Courtroom 960  
Central Islip, New York 11722

Re: *Equal Employment Opportunity Commission v. Absolut Facilities  
Management LLC, et al.*, Adversary Proceeding No. 20-8055-ast

Dear Judge Trust:

The undersigned represent the parties in the above-referenced Adversary Proceeding. The parties respectfully submit this letter pursuant to the Court's September 28, 2022 directive to submit a revised briefing schedule for Plaintiff Equal Employment Opportunity Commission's cross-motion for summary judgment.

Accordingly, the parties propose the following briefing schedule:

|           |  |
|-----------|--|
| 12/1/22:  | Joint R. 7056 statement, Plaintiff's additional facts, if any, and Plaintiff's cross-motion due; |
| 12/15/22: | Defendants' statement of additional facts, if any, due;  |
| 1/5/23:   | Plaintiff's response to Defendants' statement of additional facts, if any, due;                  |
| 1/19/23:  | Defendants' opposition due;  |
| 2/14/23:  | Pre-trial conference or any date convenient for the Court (counsel for                           |

Plaintiff is unavailable January 23-February 3 due to trial in a different matter)

The parties thank the Court for its attention to this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York  
*Attorney for Plaintiff*

By: /s/ Megan J. Freismuth  
Megan J. Freismuth  
Assistant U.S. Attorney  
631-715-7905  
Megan.freismuth@usdoj.gov

AMINI LLC  
*Attorney for the Defendants*

By: /s/ Jeffrey Chubak  
Jeffrey Chubak  
jchubak@aminillc.com